

From: Ruth S.Sperling

Affiliation:

Address: PO Box 144
Pearblossom, California, 93553

Comment: Susan Childs, Project Manager
Northeast National Petroleum Reserve-Alaska Plan Amendment
Bureau of Land Management
Alaska State Office (930)
222 West 7th Ave.
Anchorage, AK 99513-7599

Dear Ms. Childs:

1

I feel that there a number of significant reasons that your preferred alternative for amending the oil and gas leasing plan for the northeastern planning area of the National Petroleum Reserve-Alaska (NPR-A) is not the correct action to take.

2

I urge you to select Alternative A, the No Action Alternative, and then prepare a new plan that will strengthen the existing environmental and wildlife protection in the area, especially in the critical and fragile Teshekpuk Lake region.

003
Special
Designation

The risk to wildlife is simply too great, the consequences too likely to be irreversible. There are a number of wildlife populations that would be affected detrimentally by oil and gas exploration and development in this area, particularly that of the Teshekpuk Lake Surface Protection Area, one of the most important tundra-wetland ecosystems remaining in the world. Large percentages of the world populations Pacific geese depend on the safety of this area during the molting season when the geese are flightless and vulnerable and, in your preferred alternative, they are entirely unprotected.

004
Wildlife

Polar bears and the Teshekpuk Lake Caribou Herd would also be impacted -- the habitat in this area is used by both species and is critical calving grounds for the Teshekpuk Lake Caribou Herd.

005
Wildlife

Wildlife scientists have already studied the effects of existing petroleum development on the North Slope -- there has been disruption of caribou herds and displacement to areas of poorer quality forage, even in newer oil fields that incorporate design features that allow the caribou to move more freely. Evaluation of resource development patterns in existing oil fields demonstrates the cumulative increase and interconnectedness of infrastructure and resulting fragmentation of tundra habitats. Habitat fragmentation is of special concern for species requiring large areas such as caribou, bears, and geese.

006
Wildlife

I am concerned about impacts to habitats from the infrastructure of oil and gas exploration and petroleum development, such as:

007
Water R.

1. Loss of riparian habitats that are critical for a number of species.
2. Alterations of water ecosystems through withdrawal of freshwater and construction of petroleum-related facilities.

008
Haz Mat

3. Releases of toxic materials into wetlands, waterways, and the atmosphere as the result of petroleum development activities.

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009
Wildlife

This area is important for long-term survival of very large numbers of species that live there and others that use the area during migration.

10

The level of protection of your preferred alternative will not begin to protect the geese, the caribou or the dozens of other species that now find safety there. Your proposal would jeopardize a globally significant ecological resource.

11

Please choose Alternative A, the No Action Alternative, in this plan.

Sincerely,

Ruth S. Sperling
P.O. Box 144
Pearblossom, CA 93553

Attached: None